

EXHIBIT R

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

SMARTMATIC USA CORP.,
SMARTMATIC INTERNATIONAL
HOLDING B.V. and SGO
CORPORATION LIMITED,

Plaintiffs,

v.

MICHAEL J. LINDELL and
MY PILLOW, INC.,

Defendants.

Case No. 22-cv-00098- WMW-JFD

**DEFENDANT MICHAEL J. LINDELL
FOURTH SUPPLEMENTAL ANSWERS
AND OBJECTIONS TO PLAINTIFFS'
FIRST SET OF INTERROGATORIES**

TO: PLAINTIFFS AND THEIR COUNSEL OF RECORD

Defendant Michael J. Lindell ("Lindell" or "Defendant") for his objections and answers to Plaintiffs' First Set of Interrogatories states as follows:

GENERAL OBJECTIONS

1. Defendant objects to Plaintiffs' Interrogatories to the extent they call for the disclosure of information protected by any privilege. To the extent any Answer states that documents or information will be produced, that shall not include privileged documents or information. In the event any documents or information provided in response to any Interrogatory contains privileged documents or information, such production is inadvertent. No answer by Defendant contained herein shall constitute a waiver of a privilege or any other protection from discovery.

2. Defendant objects to Plaintiffs' Interrogatories to the extent they are vague, overly broad, unduly burdensome, oppressive, not limited in time frame or scope, or propounded for an improper purpose, including to harass Defendant, or are otherwise in violation of any provision of the discovery rules of the Federal Rules of Civil Procedure.

3. Defendant objects to Plaintiffs' Interrogatories to the extent they seek information that is not relevant, inadmissible at trial, not calculated to lead to the discovery of admissible evidence, lacking in foundation, or improper in form. Defendant

does not waive any general or particular objection in the event any information is provided that is within the scope of this objection.

4. Defendant objects to Plaintiffs' Interrogatories to the extent they are unreasonably cumulative, duplicative, or seek information obtainable from some other source that is more convenient, less burdensome, or less expensive, without limitation, information already in the possession, custody or control of Plaintiffs or their counsel, or which have already been provided in this litigation.

5. Defendant objects to Plaintiffs' Interrogatories to the extent they are vague or ambiguous or contain undefined terms and improperly require Defendant to speculate about the intended meaning.

6. Defendant objects to Plaintiffs' Interrogatories to the extent they require Defendant to guess or speculate as to the knowledge, information, thoughts, beliefs, actions, motivations, or intentions of other parties over whom Defendant has no control.

7. Defendant objects to Plaintiffs' Interrogatories to the extent they seek information that is not in Defendant's possession, custody, or control.

8. Defendant objects to Plaintiffs' Interrogatories to the extent they seek information unrelated to the issues in this litigation.

9. Subject to the objections otherwise set forth, to the extent any Interrogatories state that documents will be produced, such documents will be produced at a date, time, and place and in a manner agreed to by counsel for the parties.

10. Discovery is continuing and not complete. Defendant has not concluded a full investigation of the facts relating to this case, formal discovery, or preparation for trial. Defendant reserves the right to rely upon additional information and documents uncovered through further investigation of this matter.

11. Defendant expressly incorporates these General Objections into each Answer below. Every Answer is made subject to and without waiving or limiting these General Objections or any other objections stated in the Interrogatories.

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INTERROGATORY NO. 1

Identify every statement about SMARTMATIC that you have published and state the date of the statement and where it was published, including all republications.

ANSWER - 12/05/2022:

Defendant objects to this Interrogatory because it seeks the discovery of information that is not relevant to any party's claims or defenses. Defendants further object to this Interrogatory because it is overbroad by requesting Defendants to recount every statement made about Plaintiffs, regardless of whether the statements relate to this litigation, and then investigate every way each such statement was republished. Subject to the foregoing, Defendant directs Plaintiffs to documents produced in this litigation and the documents attached to Plaintiffs' Complaint.

FIRST SUPPLEMENTAL ANSWER – 1/11/2023:

Plaintiffs have agreed to narrow the scope of Interrogatory Number 1 to include only statements made on what Plaintiffs have termed the "Accused Programs." In response to this revised inquiry, Mr. Lindell states that the programs identified by Smartmatic are as readily available to it as they are to Mr. Lindell. The statements referring specifically to Smartmatic can be derived by viewing or listening to the alleged programs. Mr. Lindell does not know every instance in which any of the statements about Smartmatic were republished.

SECOND SUPPLEMENTAL ANSWER – 9/1/2023:

Pursuant to the meet-and-confer process and the Court's August 1, 2023, Order, Lindell's answer is based on his investigation to date of the information in his possession, custody, or control. Lindell reserves the right to supplement this response in accordance with the Federal Rules of Civil Procedure, the Local Rules of this Court, any Court order, and other applicable rules, including based on his discovery of additional documents or information, and to rely upon such information, documents, or objections in any hearing, trial, or other proceeding in this litigation.

Without waiving any previously stated objection, the *Absolute Proof* movie was uploaded to Vimeo, Rumble, and YouTube on or about February 5, 2021, and was subsequently taken down. It was uploaded to LindellTV.com in approximately the same timeframe. For a period of time, MichaelJLindell.com was redirected to LindellTV.com. FrankSpeech.com was launched in April of 2021, and, upon information and belief, the *Absolute Proof* was uploaded shortly after. Defendant Lindell did not upload the "Accused Programs" to WWV, OANN, RSNB or TheAmericanReport.org.

Defendants are investigating the publish dates for the rest of the Absolute Proof series and the Cyber Symposium pursuant to the Court's Order.

FOURTH SUPPLEMENTAL ANSWER – 9/27/2023:

Defendant Lindell reserves the right to supplement this response in accordance with the Federal Rules of Civil Procedure, the Local Rules of this Court, any Court order, and other applicable rules, including based on his discovery of additional documents or information, and to rely upon such information, documents, or objections in any hearing, trial, or other proceeding in this litigation.

Without waiving any previously stated objection:

Absolute Proof: was published on Vimeo, Rumble, and YouTube on February 5, 2021, and was subsequently taken down. It was published to LindellTV.com on February 17, 2021. It was published to Frankspeech.com on April 18, 2021. It was published on AbsoluteProof.FYI on November 25, 2021. It was published on OAN on February 5 & 6, 2021.

Scientific Proof: was published on LindellTV.com on March 31, 2021. It was published to Frankspeech.com on May 3, 2021. It was published on ScientificProof.FYI on April 1, 2021.

Absolute Interference: was published on LindellTV.com on April 10, 2021. It was published to Frankspeech.com in April 22, 2021. It was published on AbsoluteInterference.FYI on April 11, 2021.

Absolute 9-0: was published on LindellTV.com on June 4, 2021. It was published to Frankspeech.com on July 20, 2021.

Cyber Symposium: Parts of the Cyber Symposium were published on LindellTV.com on August 12, 2021. It was livestreamed to Frankspeech.com on August 10, 11, and 12, 2021.

INTERROGATORY NO. 2

Identify all Persons, including MY PILLOW EMPLOYEES, who drafted, edited, reviewed, developed, investigated, approved, produced, directed, made any decision regarding, appeared on, or otherwise contributed to, any aspect of the ACCUSED PROGRAMS, DEFAMATORY BROADCASTS, LINDELL APPEARANCES, or the "March for Trump" tour and tour bus referenced in paragraph 76 of the Complaint. For each, include the person's name, title, and contact information, and describe his or her involvement.

ANSWER - 12/05/2022:

Defendant objects to this Interrogatory because it seeks the discovery of information that is not relevant to any party's claims or defenses, in particular because it seeks information related to companies other than Plaintiffs. Defendant further objects to this Interrogatory because it is overbroad by requesting Defendant to produce information about the topics identified regardless of whether the statements relate to this litigation. Defendant further objects to this Interrogatory to the extent it seeks information about communications protected by the attorney-client privilege, the work product doctrine, or another limitation on Defendant's discovery obligations. Subject to the foregoing, Defendant states that Mr. Lindell was responsible for the statements referenced and those statements were made in his personal capacity and not as a My Pillow, Inc., employee, or agent. Other individuals may have performed administrative tasks but were not responsible for developing content. Discovery continues.

FIRST SUPPLEMENTAL ANSWER – 1/11/2023:

Without waiver of a previously stated objection, Defendant states that he will provide a supplemental response when custodians of relevant documents have been identified. Discovery continues.

THIRD SUPPLEMENTAL ANSWER – 9/1/2023:

Without waiving any previously stated objections, Defendant's responses are based on information within his possession, custody, or control and in which he reasonably believes is responsive. Defendant reserves the right to amend or supplement these answers in accordance with the Federal Rules of Civil Procedure, the Local Rules of this Court, and any Court order, and other applicable rules, including based on his discovery of additional information and to rely upon such information in any hearing, trial or other proceeding in this litigation.

Defendant objects to the terms "DEFAMATORY BROADCASTS" and "DEFAMATORY STATEMENTS" as improperly asserting a legal conclusion. Defendant denies that he has defamed anyone.

To the best of his recollection, the following people, at minimum, contributed to or appeared on the programs, broadcasts, and appearances listed above:

1. Shiva Ayyadurai
2. Melissa Carone
3. Patrick Colbeck
4. Confidential Informant #3

5. Cyber Security Confidential Informant
6. Matthew DePerno
7. Mary Fanning
8. Michael Flynn
9. Douglas Frank
10. Brannon Howse
11. Logan Howse
12. Alan Jones
13. Michael Lindell
14. Thomas McInerney
15. Russel Ramsland
16. Terry Turchie
17. M. Philip Waldron

FOURTH SUPPLEMENTAL ANSWER – 9/27/2023:

Without waiving any previously stated objection, Confidential Informant #3 is believed to be Conan Hayes. Defendant does not recall the name of the Cyber Security Confidential Informant but believes Mary Fanning, Executive Producer, or Brannon Howse, Senior Production Manager, may possess that information.

INTERROGATORY NO. 3

Identify all Persons who drafted, edited, reviewed, developed, investigated, approved, produced, directed, made any decision, or otherwise contributed to the content of any segment, interview, statement, post, or article published on any LINDELL WEBSITE, MYPILLOW.COM account, or your personal and/or professional social media accounts, regarding SMARTMATIC, DOMINION, and/or the election technologies and systems used during the 2020 PRESIDENTIAL ELECTION. For each, identify the person's job title, employer, his or her role regarding the content, including whether they drafted, edited, reviewed, investigated, directed, approved, or made any decision regarding the content, segment, interview, statement, article, or social media post, and the person's relationship to You or MY PILLOW, if any.

ANSWER - 12/05/2022:

Defendant objects to this Interrogatory because it seeks the discovery of information that is not relevant to any party's claims or defenses, in particular because it seeks information related to companies other than Plaintiffs. Defendant further objects to this Interrogatory because it is overbroad by requesting

Defendant to produce information about the topics identified regardless of whether the statements relate to this litigation. Defendant further objects to this Interrogatory to the extent it seeks information about communications protected by the attorney-client privilege, the work product doctrine, or another limitation on Defendant's discovery obligations. Subject to the foregoing, Defendant states that Mr. Lindell was responsible for developing the referenced content, and did so in his personal capacity and not as a My Pillow, Inc., employee. Other individuals may have performed administrative tasks, but were not responsible for developing content. Discovery continues.

FIRST SUPPLEMENTAL ANSWER – 1/11/2023:

Without waiver of a previously stated objection, Defendant states that he will provide a supplemental response when custodians of relevant documents have been identified.

SECOND SUPPLEMENTAL ANSWER – 8/4/2023:

Without waiver of a previously stated objection, Defendant's responses are based on his investigation to date of those sources within his possession, custody, or control and in which he reasonably believes responsive documents or information may exist. Defendant will amend or supplement these answers in accordance with the Federal Rules of Civil Procedure, the Local Rules of this Court, and any Court order, and other applicable rules, including based on his discovery of additional documents or information, and to rely upon such information, documents, or objections in any hearing, trial or other proceeding in this litigation.

Defendant objects to the terms "DEFAMATORY BROADCASTS" and "DEFAMATORY STATEMENTS" as improperly asserting a legal conclusion. Defendant denies that he has defamed anyone.

To the best of his recollection, Defendant relied upon the following sources, at minimum, when making the programs, broadcasts, statements, and appearances referenced above. At the time the statements were made, Defendant may have relied upon additional sources that he no longer remembers at this time. Some of the sources on which he relied are no longer available. Furthermore, the vulnerabilities in electronic voting machines, as well as reported instances of vote manipulation with electronic voting machines, have been widely and continuously reported in mainstream news and other sources for at least 15 years prior to and through the 2020 election. Such information is so voluminous and widespread in the general public, it is impossible to list every source, interview, or conversation Defendant relied upon for the programs, broadcasts, statements, and appearances referenced above. Investigation in this matter is continuing. Specifically, to the best of his recollection, Defendant relied upon the following sources and individuals:

- 1 Cumulative and final vote tallies in the 2020 presidential election, as they were
reported in national media during November and December 2020 and thereafter
- 2 Historical voting results as compared with 2020 voting results
- 3 Sidney Powell, attorney and former federal prosecutor
- 4 Lt. Gen. Michael Flynn, former national security advisor
- 5 Dr. Douglas Frank
- 6 Bev Harris, author of *Black Box Voting*
- 7 John Ratcliffe, former National Security Advisor
- 8 Peter Navarro, Professor Emeritus of Economics and Public Policy, University of
California, Irvine
- 9 Patrick Byrne, business executive
- 10 Alfio D'Urso, Via Vittorio Emanuele, Catania, Italy
- 11 Doug Logan
- 12 Maria Zack
- 13 Dennis Montgomery, programmer and former U.S. intelligence contractor
- 14 Dr. Navid Keshavarz-Nia
- 15 Rudy Giuliani, attorney, former mayor of New York City, and former United States
Attorney
- 16 William E. Binney, former National Security Agency intelligence official
- 17 Clint Curtis, attorney
- 18 Dr. Shiva Ayyadurai
- 19 Col. Phil Waldron
- 20 Lin Wood, attorney
- 21 Lt. General Thomas McInerney
- 22 Russell Ramsland and Allied Security Operations Group
- 23 Draza Smith
- 24 Conan Hayes
- 25 Jovan Hutton Pulitzer
- 26 Patrick Colbeck, engineer and former Michigan state senator
- 27 Matthew S. DePerno, attorney
- 28 Kathy Barnett
- 29 David Shafer, 12th congressional district Republican Committee and former
chairman of GA Republican party

30 Gail Golec, Arizona
31 Shelby Busch, Arizona
32 Liz Harris, Arizona
33 Shawn Smith
34 Heather Honey
35 Brannon Howse
36 Charles Herring
37 Chris Ruddy
38 Alan Duke
39 Gordon Pennington
40 Emily Powell
41 Garland Favorito, Georgia
42 Senator Amy Klobuchar, Minnesota
43 J. Alexander Halderman, Professor of Computer Science and Engineering,
University of Michigan
44 Chris Krebs, former director of the Cybersecurity & Infrastructure Security Agency
45 David Jefferson, PhD, Technical Advisor to California Secretary of State
46 Kirstjen Nielson, former Homeland Security Secretary
47 Brad Johnson, retired CIA station chief writing at intelreform.org
48 Chris Prudhome
49 Matt Schlapp
50 Jake Braun, former White House Liaison, Department of Homeland Security
51 Melissa Carone
52 Tomi Collins
53 Professor Walter Daugherty
54 Mary Fanning
55 Eric Coomer, former employee of Dominion Voting Systems, including Coomer's
presentation to Cook County, Illinois in April 2017
56 Michael Daniel, former White House Cybersecurity Coordinator
57 Professor David Dill, Stanford University
58 Jenna Ellis, attorney
59 Edward Solomon
60 James Troupis, attorney

- 61 Mike Ferris, attorney
- 62 Ron Coleman, attorney at Dhillon law group
- 63 Sean Hannity
- 64 Jeff O'Donnell
- 65 AB Haynes
- 66 Alan Jones
- 67 Wayne Allyn Root
- 68 Pete Santilli
- 69 John R. Mills
- 70 General Leroy Sisco
- 71 Jacob Stauffer, former cyber analyst for U.S. Air Force
- 72 Jason Sullivan, presidential advisor
- 73 Douglas C. Anderson, Wall Street Capital Partners, New York
- 74 Ryan Howard, Seattle
- 75 Veronica Corcoran, precinct committeewoman in Maricopa County
- 76 Phil Kline, former Kansas Attorney General
- 77 Kristen Williamson, Arizona journalist
- 78 Dan Mowery, New Hampshire
- 79 Terry Turchie, former FBI agent
- 80 CNN coverage of DEFCON hacking conference
- 81 Harri Hursti
- 82 Confidential Informant #3, from *Absolute Interference*
- 83 Kurt Olsen, Attorney

FOURTH SUPPLEMENTAL ANSWER – 9/27/2023:

Without waiving any previously stated objections, Defendant's responses are based on information within his possession, custody, or control and in which he reasonably believes is responsive. Defendant reserves the right to amend or supplement these answers in accordance with the Federal Rules of Civil Procedure, the Local Rules of this Court, and any Court order, and other applicable rules, including based on his discovery of additional information and to rely upon such information in any hearing, trial or other proceeding in this litigation.

To the best of his recollection, the following people, at the best of his recollection, the following people posted to MichaelJLindell.com, MyPillow.com, and/or the

personal and professional social media accounts regarding the election technologies and systems used during the 2020 presidential election.

1. Michael Lindell, CEO of My Pillow
2. Bobbi Anderson, Website Analyst
3. Heidi O'Donnell, Digital Marketing Specialist
4. Todd Carter, Chief Technology Officer

INTERROGATORY NO. 4

Identify all sources of information that You used for the ACCUSED PROGRAMS, DEFAMATORY BROADCASTS, DEFAMATORY STATEMENTS, or LINDELL APPEARANCES. For documents, list the Persons, including any LINDELL EMPLOYEES or MY PILLOW EMPLOYEES, OTHER NEWS ORGANIZATIONS, and Persons affiliated with You, who reviewed the documents, when he or she received and/or reviewed them, and describe the documents. For Persons interviewed or contacted, list their name, employer, title, and contact information, and describe their interaction with You, including the dates of any interview(s), the Person(s) affiliated with You who interviewed or contacted them, and the information they provided to You. For any other sources, describe the source and the information provided.

ANSWER - 12/05/2022:

Defendant objects to this Interrogatory because it seeks the discovery of information that is not relevant to any party's claims or defenses, in particular because it seeks information related to companies other than Plaintiffs. Defendant further objects to this Interrogatory because it is overbroad by requesting Defendant to produce information about the topics identified regardless of whether the statements relate to this litigation. Subject to the foregoing, Defendant states that Mr. Lindell utilized information learned from his guests to develop content for the identified broadcasts and appearances. Defendant directs Plaintiffs to the documents produced in response to Plaintiffs' Requests for Production of Documents for additional information. Discovery continues.

FIRST SUPPLEMENTAL ANSWER – 1/11/2023:

Without waiver of a previously stated objection, Defendant states that he will provide a supplemental response when custodians of relevant documents have been identified.

SECOND SUPPLEMENTAL ANSWER – 8/4/2023:

Without waiver of a previously stated objection, Defendant's responses are based on his investigation to date of those sources within his possession, custody, or control and in which he reasonably believes responsive documents or information may exist. Defendant will amend or supplement these answers in accordance with

the Federal Rules of Civil Procedure, the Local Rules of this Court, and any Court order, and other applicable rules, including based on his discovery of additional documents or information, and to rely upon such information, documents, or objections in any hearing, trial or other proceeding in this litigation.

Defendant objects to the terms “DEFAMATORY BROADCASTS” and “DEFAMATORY STATEMENTS” as improperly asserting a legal conclusion. Defendant denies that he has defamed anyone.

1. Cumulative and final vote tallies in the 2020 presidential election, as they were reported in national media during November and December 2020 and thereafter
2. Historical voting results as compared with 2020 voting results
3. Sidney Powell, attorney, and former federal prosecutor
4. Lt. Gen. Michael Flynn, former national security advisor
5. Dr. Douglas Frank
6. Bev Harris, author of *Black Box Voting*
7. John Ratcliffe, former National Security Advisor
8. Peter Navarro, Professor Emeritus of Economics and Public Policy, University of California, Irvine
9. Patrick Byrne, business executive
10. Alfio D’Urso, Via Vittorio Emanuele, Catania, Italy
11. Doug Logan
12. Maria Zack
13. Dennis Montgomery, programmer and former U.S. intelligence contractor
14. Dr. Navid Keshavarz-Nia
15. Rudy Giuliani, attorney, former mayor of New York City, and former United States Attorney
16. William E. Binney, former National Security Agency intelligence official
17. Clint Curtis, attorney
18. Dr. Shiva Ayyadurai
19. Col. Phil Waldron
20. Lin Wood, attorney
21. Lt. General Thomas McInerney

22. Russell Ramsland and Allied Security Operations Group
23. Draza Smith
24. Conan Hayes
25. Jovan Hutton Pulitzer
26. Patrick Colbeck, engineer and former Michigan state senator
- 27.. Matthew S. DePerno, attorney
28. Kathy Barnett
29. David Shafer, 12th congressional district Republican Committee and former chairman of GA Republican party
30. Gail Golec, Arizona
31. Shelby Busch, Arizona
32. Liz Harris, Arizona
33. Shawn Smith
34. Heather Honey
35. Brannon Howse
36. Charles Herring
37. Chris Ruddy
38. Alan Duke
39. Gordon Pennington
40. Emily Powell
41. Garland Favorito, Georgia
42. Senator Amy Klobuchar, Minnesota
43. J. Alexander Halderman, Professor of Computer Science and Engineering, University of Michigan
44. Chris Krebs, former director of the Cybersecurity & Infrastructure Security Agency
45. David Jefferson, PhD, Technical Advisor to California Secretary of State
46. Kirstjen Nielson, former Homeland Security Secretary
47. Brad Johnson, retired CIA station chief writing at intelreform.org
48. Chris Prudhome
49. Matt Schlapp

50. Jake Braun, former White House Liaison, Department of Homeland Security
51. Melissa Carone
52. Tomi Collins
53. Professor Walter Daugherty
54. Mary Fanning
55. Eric Coomer, former employee of Dominion Voting Systems, including Coomer's presentation to Cook County, Illinois in April 2017
56. Michael Daniel, former White House Cybersecurity Coordinator
57. Professor David Dill, Stanford University
58. Jenna Ellis, attorney
59. Edward Solomon
60. James Troupis, attorney
61. Mike Ferris, attorney
62. Ron Coleman, attorney at Dhillon law group
63. Sean Hannity
64. Jeff O'Donnell
65. AB Haynes
66. Alan Jones
67. Wayne Allyn Root
68. Pete Santilli
69. John R. Mills
70. General Leroy Sisco
71. Jacob Stauffer, former cyber analyst for U.S. Air Force
72. Jason Sullivan, presidential advisor
73. Douglas C. Anderson, Wall Street Capital Partners, New York
74. Ryan Howard, Seattle
75. Veronica Corcoran, precinct committee woman in Maricopa County
76. Phil Kline, former Kansas Attorney General
77. Kristen Williamson, Arizona journalist
78. Dan Mowery, New Hampshire

- 79. Terry Turchie, former FBI agent
- 80. CNN coverage of DEFCON hacking conference
- 81. Harri Hursti
- 82. Confidential Informant #3, from *Absolute Interference*
- 83. Kurt Olsen, Attorney

FOURTH SUPPLEMENTAL ANSWER – 9/27/2023:

Without waiving previously stated objections, to the best of his recollection, Defendant relied upon the following sources, at minimum, when making the programs, broadcasts, statements, and appearances referenced above. At the time the statements were made, Defendant may have relied upon additional sources that he no longer remembers at this time. Some of the sources on which he relied are no longer available. Furthermore, it has been widely and continuously reported in mainstream news and other sources for at least 15 years prior to and through the 2020 election the vulnerabilities in electronic voting machines, as well as reported instances of vote manipulation with electronic voting machines. Such information is so voluminous and widespread in the general public, it is impossible to list every source, interview, or conversation Defendant relied upon. To the best of his recollection, Defendant relied upon the following sources and individuals:

- 84. *Kill Chain* documentary from HBO
- 85. News coverage and court filings concerning the 2020 election results in Antrim County, Michigan
- 86. News coverage concerning the *Curling v. Raffensperger* lawsuit in Georgia
- 87. News coverage concerning election results and controversies in Maricopa County, Arizona
- 88. News coverage concerning election results and controversies in Fulton County, Georgia
- 89. News coverage concerning Pennsylvania state legislature hearings on the 2020 election
- 90. News coverage and court filings concerning the *Texas v. Pennsylvania* lawsuit
- 91. News coverage and court filings concerning the *Donald J. Trump for President, Inc. v. Boockvar* lawsuit
- 92. The addition of more than 100,000 votes for Joseph Biden to the state vote totals in Michigan, in the middle of the night of Nov. 3, 2020
- 93. Election coverage in the *Epoch Times*

94. Election coverage on Fox News
95. Election coverage on Gateway Pundit
96. Election coverage on Newsmax
97. Election coverage on One America News Network
98. Election coverage in the Washington Examiner
99. Election coverage on theamericanconservatives.net
100. News coverage of investigations into 2020 election conducted by Arizona, New Hampshire, and Wisconsin
101. News coverage of voting machine hacks at DEF CON hacking convention
102. News coverage of election computer improper functioning in Ware County, Georgia
103. News articles concerning manipulation of 2020 election results by persons located in Italy, including:
 - <https://federalinquirer.com/global-defense-contractor-it-expert-testifies-in-italian-court-he-and-othersswitched-votes-in-the-u-s-presidential-race/>
 - *BOMBSHELL: IT Expert And Global Defense Contractor Testifies in Italian Court That He And Others Rigged Machines To Switch Votes To Biden In US Election*, <https://en-volve.com/2021/01/06/bombshell-it-expert-and-global-defense-contractor-testifies-in-italian-court-that-he-and-others-rigged-machines-to-switch-votes-to-biden-in-us-election/>
 - <https://intelreform.org/deposition-in-italian-federal-court-leonardo-employee-details-election-interference/>
 - <https://itnshow.com/2021/01/07/breaking-affidavit-delivered-to-congress-yesterday-from-italian-defense-company-employee-confessing-vote-manipulation-in-u-s-election-on-nov-3/>
 - <https://noqreport.com/2021/01/06/conte-leonardo-spa-and-the-u-s-embassy-behind-the-election-data-switch-fraud-to-take-out-trump/>
 - <https://www.sott.net/article/446846-Senior-IT-expert-at-global-defense-contractor-testifies-in-Italian-federalcourt-he-and-others-switched-votes-for-Biden-in-US-presidential-race>
 - <https://stillnessinthestorm.com/2021/01/huge-foreign-interference-it-expert-from-global-defense-contractortestifies-in-italian-court-admits-to-switching-votes-in-us-presidential-election/>
 - <https://welovetrump.com/2021/01/06/foreign-interference-it-expert-from-global-defense-contractor-testifiesin-italian-court-admits-to-switching-votes-in-us-presidential-election/>
 - <https://observernew.blogspot.com/2021/01/expert-and-global-defense-contractor.html?m=1>

104. Analyses of 2020 election results, including but not limited to
- *Unmasked: Has the truth about the 2020 election been uncovered?*, available at <https://rumble.com/vdlomr-unveiled-the-2020-election.html>
 - *The Plot to Steal America*, available at <https://youtu.be/rXtGItn1bvQ>
 - <https://rumble.com/vc5nk7-georgia-a-close-look-at-the-data-and-events-of-the-general-election-chapter.html>
 - John Droz, Dr. William M. Briggs, Thomas Davis, <https://www.lifesitenews.com/news/evidence-seems-to-indicate-algorithm-manipulation-in-the-2020-election>
 - <https://nationsinaction.org/2021/01/press-release-voter-fraud/>
 - John R. Lott, *Simple tests for the extent of vote fraud with absentee and provisional ballots in the 2020 US presidential election*, available at https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3756988
 - December 11, 2020 open letter from the Every Legal Vote Coalition
 - https://www.americanthinker.com/articles/2020/11/the_founders_outsmarted_the_presidential_election_fraudsters.html
 - <https://theamericanconservatives.net/breaking-expert-identifies-200000-votes-hi-jacked-from-trump-to-biden-in-georgia-at-the-precinct-level/>
 - https://www.thegatewaypundit.com/2020/12/breaking-huge-simple-math-shows-biden-claims-13-million-votes-eligible-voters-voted-2020-election/?utm_source=Twitter&utm_campaign=websitesharingbuttons
 - <https://www.teaparty.org/breaking-peter-navarro-member-of-trumps-team-just-dropped-a-massive-report-on-election-fraud-that-proves-trump-won-461062/>
105. Articles concerning cybersecurity and manipulation and/or hacking of commonly used voting machines:
- <https://www.politico.com/magazine/story/2016/08/2016-elections-russia-hack-how-to-hack-an-election-in-seven-minutes-214144/>
 - <https://engineering.princeton.edu/news/2016/09/29/computer-science-professor-urges-congress-secure-voting>
 - <https://oversight.house.gov/hearing/cybersecurity-ensuring-integrity-ballot-box/>
 - <https://www.nbcnews.com/politics/elections/online-vulnerable-experts-find-nearly-three-dozen-u-s-voting-n1112436>

- <https://oversight.house.gov/wp-content/uploads/2016/09/2016-09-28-Appel-Princeton-Testimony.pdf>
- <https://engineering.princeton.edu/news/2016/09/29/computer-science-professor-urges-congress-secure-voting>

INTERROGATORY NO. 5

Identify and describe all information provided to You regarding SMARTMATIC, DOMINION, or any allegation of fraud or irregularities involving the election technologies or systems used during the 2020 PRESIDENTIAL ELECTION, including but not limited to, information provided by the GUESTS, and state the date the information was received, the form of the information, the person or entity who provided it, and the manner in which it was received by You.

ANSWER - 12/05/2022:

Defendant objects to this Interrogatory because it seeks the discovery of information that is not relevant to any party's claims or defenses, in particular because it seeks information related to companies other than Plaintiffs. Defendant further objects to this Interrogatory because it is overbroad by requesting Defendant to produce information about the topics identified regardless of whether the statements relate to this litigation. Subject to the foregoing, Defendant states that Mr. Lindell utilized information from a variety of sources to develop content for the identified broadcasts and appearances. Defendant directs Plaintiffs to the documents produced in response to Plaintiffs' Requests for Production of Documents for additional information. Discovery continues.

FIRST SUPPLEMENTAL ANSWER - 1/11/2023:

Without waiver of a previously stated objection, Defendant states that he will provide a supplemental response identifying documents produced when its review of potentially responsive documents is complete.

FOURTH SUPPLEMENTAL ANSWER - 9/27/2023:

Without waiving any previously stated objections, Defendant objects to the interrogatory to identify "all information provided to You" as better suited for a deposition as opposed to an interrogatory response. Defendant's answer is based on information within his possession, custody, or control and in which he reasonably believes is responsive. To his knowledge, Defendant has produced all responsive documents. *See*, Fourth Supplemental Answer to Interrogatory No. 4.

Defendant reserves the right to amend or supplement these answers in accordance with the Federal Rules of Civil Procedure, the Local Rules of this Court, and any Court order, and other applicable rules, including based on his discovery of additional information and to rely upon such information in any hearing, trial or other proceeding in this litigation.

INTERROGATORY NO. 6

Identify and describe all compensation, consideration, or non-monetary exchange of value provided by you to any GUESTS from January 1, 2018 to the present. For any monetary exchange, describe the amount, date, and nature of each compensation. For any non-monetary exchange, describe what was exchanged and when.

ANSWER - 12/05/2022:

Defendant is unaware of any compensation, consideration, or non-monetary exchange provided to the identified individuals, with the exception of an executive-producer fee paid to Mary Fanning in connection with the *Absolute Proof* and *Absolute Interference* documentaries. Discovery continues.

FIRST SUPPLEMENTAL ANSWER – 1/11/2023:

Mary Fanning was compensated a total of \$200,000.00 total for her work on the *Absolute Proof* and *Absolute Interference* documentaries.

INTERROGATORY NO. 7

Identify all actions that were taken to assess, analyze, examine, investigate, explore, test, probe, confirm, or evaluate, directly or indirectly, the truth, falsity, veracity, accuracy, or inaccuracy of the information and/or Persons providing the information for the DEFAMATORY STATEMENTS prior to their being aired, and/or after re-airing or otherwise publishing them. For each action, state when it took place, who performed the action, and who was aware of the action, including Yourself.

ANSWER - 12/05/2022:

Defendant objects to this Interrogatory because it seeks the discovery of information that is not relevant to any party's claims or defenses, in particular because it seeks information related to companies other than Plaintiffs. Subject to the foregoing, Defendant states that Mr. Lindell utilized information from a variety of sources to develop content for the identified broadcasts and appearances. Defendant directs Plaintiffs to the documents produced in response to Plaintiffs' Requests for Production of Documents for additional information. Plaintiffs are further directed to the response and objection to Interrogatory Number 4. Discovery continues.

FIRST SUPPLEMENTAL ANSWER – 1/11/2023:

Without waiver of a previously stated objection, Defendant states that he will provide a supplemental response identifying documents produced when its review of potentially responsive documents is complete.

FOURTH SUPPLEMENTAL ANSWER - 9/27/2023:

Without waiving any previously stated objections, Defendant objects to the interrogatory to identify “all actions that were taken to assess, analyze, examine, investigate, explore, test, probe, confirm, or evaluate, directly or indirectly, the truth, falsity, veracity, accuracy, or inaccuracy of the information and/or Persons providing the information” as better suited for a deposition as opposed to an interrogatory response. Defendant’s answer is based on information within his possession, custody, or control and in which he reasonably believes is responsive. To his knowledge, Defendant has produced all responsive documents. *See*, Fourth Supplemental Answer to Interrogatory No. 4.

Defendant reserves the right to amend or supplement these answers in accordance with the Federal Rules of Civil Procedure, the Local Rules of this Court, and any Court order, and other applicable rules, including based on his discovery of additional information and to rely upon such information in any hearing, trial or other proceeding in this litigation.

INTERROGATORY NO. 8

Identify all Persons who sponsored or otherwise provided financing for the ACCUSED PROGRAMS, DEFAMATORY BROADCASTS, or the “March for Trump” tour and tour bus referenced in paragraph 76 of the Complaint, and state the amount of money that each Person contributed.

ANSWER - 12/05/2022:

Defendant objects to this Interrogatory because it seeks the discovery of information that is not relevant to any party’s claims or defenses. Subject to the foregoing, Defendant states that My Pillow contributed \$100,000.00 to the March for Trump via wire dated December 4, 2020. There are no other known financial resources or monetary support known to exist at this time that are otherwise responsive to this Interrogatory. Discovery continues.

FIRST SUPPLEMENTAL ANSWER - 1/11/2023:

Mr. Lindell provided sponsorship and financing for the *Absolute* series of documentaries and the Cyber Symposium referenced in the Complaint. The identities of those who financed the remainder of the referenced programs are unknown at this time.

INTERROGATORY NO. 9

Identify all communications or interactions You had with DONALD TRUMP, the TRUMP ADMINISTRATION, the TRUMP CAMPAIGN, or the RNC, between January 1, 2020 and the filing of the COMPLAINT, and for each communication or interaction, identify the substance of the communication or interaction, who the communication was with, and the date, time, and location of each communication or interaction.

ANSWER - 12/05/2022:

Defendant objects to this Interrogatory because it seeks the discovery of information that is not relevant to any party's claims or defenses, in particular because it requests Defendant to produce information about the topics identified regardless of whether the statements relate to this litigation. Subject to the foregoing, Defendant directs Plaintiffs to the documents produced in response to Plaintiffs' Requests for Production of Documents for additional information. Discovery continues.

FIRST SUPPLEMENTAL ANSWER - 1/11/2023:

Without waiver of a previously stated objection, Defendant states that he will provide a supplemental response identifying documents produced when its review of potentially responsive documents is complete.

SECOND SUPPLEMENTAL ANSWER – 9/1/2023:

Pursuant to the Court's August 1, 2023, Order, this Interrogatory was narrowed to include only any pre-existing log of oral communications in which Smartmatic was mentioned, between the parties identified in the interrogatory, and for the date range specified in the interrogatory.

Without waiver of a previously stated objection, none.

INTERROGATORY NO. 10

Identify all instances in which You donated or contributed money to a political candidate, campaign, or cause, including but not limited to DONALD TRUMP, the TRUMP CAMPAIGN, the TRUMP ADMINISTRATION, or the RNC, from January 1, 2016 to the present. Your response should identify the candidate, campaign or cause, the date of the donation or contribution, and the amount of the donation or contribution.

ANSWER - 12/05/2022:

Defendant objects to this Interrogatory because it seeks the discovery of information that is not relevant to any party's claims or defenses, in particular because it requests Defendant to produce information about the topics identified regardless of whether the statements relate to this litigation. Discovery continues.

FIRST SUPPLEMENTAL ANSWER - 1/11/2023:

Without waiver of a previously stated objection, Defendant will produce a document showing donations to the referenced candidates and entities from January 1, 2016, to the present available from the Federal Election Commission. To Defendant's knowledge, no other contributions to the referenced candidates or entities were made over the time spanning January 1, 2016 to the present.

FOURTH SUPPLEMENTAL ANSWER – 9/27/2023:

Without waiving any previously stated objection, please see DEF11325173 - DEF11325174, a spreadsheet by the campaign finance data with the Federal Election Commission <https://www.fec.gov/data/browse-data/> containing the donation data made by Defendant from January 1, 2016, to the present.

INTERROGATORY NO. 11

Identify all individuals involved in the preparation, planning, and/or execution of the “March for Trump” tour and tour bus referenced in paragraph 76 of the COMPLAINT. Your response should identify the individual and the nature of their involvement.

ANSWER - 12/05/2022:

Defendant objects to this Interrogatory because it seeks the discovery of information that is not relevant to any party’s claims or defenses, in particular because it requests Defendant to produce information about the topics identified regardless of whether the statements relate to this litigation. Discovery continues.

FIRST SUPPLEMENTAL ANSWER - 1/11/2023:

Mr. Lindell agreed to participate in the “March for Trump” tour, but did not prepare, plan, or participate in the event other than through his appearances.

INTERROGATORY NO. 12

Identify all instances in which you received, heard, or otherwise acquired information providing that SMARTMATIC contracted only with Los Angeles County in connection with the 2020 PRESIDENTIAL ELECTION. For each instance, your response should provide the date and source of the information.

ANSWER - 12/05/2022:

Defendant objects to this Interrogatory to the extent it seeks information about communications protected by the attorney-client privilege, the work product doctrine, or another limitation on Defendant’s discovery obligations. Defendants further object to this Interrogatory because it is overbroad by requesting Defendant to produce information about information about statements that are not alleged to be defamatory or inside the timeframe of Plaintiffs’ claims. Subject to the foregoing, Defendant states that it has no non-privileged information responsive to this in response to this Interrogatory. Discovery continues.

FIRST SUPPLEMENTAL ANSWER - 1/11/2023:

Defendant recalls learning at some point that Smartmatic *claimed* to have contracted only with Los Angeles County in connection with the 2020 Presidential Election, but does not recall when he learned that information or from which source or sources he learned that information.

INTERROGATORY NO. 13

State the total amount of money expended to investigate, draft, develop, edit, review, report, produce, and publish each ACCUSED PROGRAM or DEFAMATORY BROADCAST.

ANSWER - 12/05/2022:

Defendant objects to this Interrogatory because it seeks the discovery of information that is not relevant to any party's claims or defenses. Defendant further objects to this Interrogatory to the extent it seeks information about communications protected by the attorney-client privilege, the work product doctrine, or another limitation on Defendant's discovery obligations. Discovery continues.

FIRST SUPPLEMENTAL ANSWER - 1/11/2023:

The total amount expended to develop the *Absolute* series of documentaries was approximately \$300,000.00. Defendant is unaware of the amount of money spent to develop many of the alleged "Defamatory Broadcasts" because he did not participate in the development of those programs.

INTERROGATORY NO. 14

If you contend that any of the DEFAMATORY STATEMENTS are true, substantially true, accurate, not misleading, and/or not defamatory, describe all facts and identify all documents that You claim support or establish that such statements are true, substantially true, accurate, not misleading, and/or not defamatory.

ANSWER - 12/05/2022:

Defendant objects to this Interrogatory to the extent it seeks information about communications protected by the attorney-client privilege, the work product doctrine, or another limitation on Defendant's discovery obligations. Subject to the foregoing, Defendant is directed to the documents produced in response to Plaintiffs' Requests for Production of Documents. Discovery continues.

FIRST SUPPLEMENTAL ANSWER - 1/11/2023:

Without waiver of a previously stated objection, Defendant states that he will provide a supplemental response identifying documents produced when its review of potentially responsive documents is complete.

FOURTH SUPPLEMENTAL ANSWER - 9/27/2023:

Defendant objects to this Interrogatory because it seeks the discovery of information that is not relevant to any party's claims or defenses. Defendant objects to the interrogatory to "describe all facts and identify all documents that You claim support or establish that such statements are true, substantially true, accurate, not misleading, and/or not defamatory" as better suited for a deposition as opposed to an

interrogatory response. Without waiving any previously stated objections, Defendant's answer is based on information within his possession, custody, or control and in which he reasonably believes is responsive. To his knowledge, Defendant has produced all responsive documents. *See*, Fourth Supplemental Answer to Interrogatory No. 4.

Defendant reserves the right to amend or supplement these answers in accordance with the Federal Rules of Civil Procedure, the Local Rules of this Court, and any Court order, and other applicable rules, including based on his discovery of additional information and to rely upon such information in any hearing, trial or other proceeding in this litigation.

INTERROGATORY NO. 15

Identify all metrics You use to quantify the number of individuals who viewed an ACCUSED PROGRAM or DEFAMATORY BROADCAST and provide the corresponding data for each ACCUSED PROGRAM or DEFAMATORY BROADCAST.

ANSWER - 12/05/2022:

Defendant did not utilize metrics to quantify the number of individuals who viewed the media referenced.

FIRST SUPPLEMENTAL ANSWER - 1/11/2023:

The purported metric data identified by Plaintiffs as originating from Johnston Howse was inaccurate and incomplete and not "used" by Defendant.

FOURTH SUPPLEMENTAL ANSWER – 9/27/2023:

Frankspeech is possession of Frankspeech metrics data. Defendant has no access, custody or control to the metrics of YouTube, Vimeo, or Rumble.

INTERROGATORY NO. 16

Identify all Persons who provided information to answer any of Smartmatic's interrogatories.

ANSWER - 12/05/2022:

These Interrogatory Answers were completed by the undersigned with the assistance of counsel.

INTERROGATORY NO. 17

Identify all Persons whom You expect will testify at trial or will otherwise present evidence in this ACTION.

ANSWER - 12/05/2022:

Defendant has not yet determined who will testify at trial in this matter. This response will be supplement in accordance with the Federal Rules of Civil Procedure and the Court's Scheduling Order.

INTERROGATORY NO. 18

Identify all communications regarding LINDELL'S promotion of MY PILLOW or its products in connection with the ACCUSED PROGRAMS, DEFAMATORY BROADCASTS, DEFAMATORY STATEMENTS, the LINDELL APPEARANCES, or the "March for Trump" tour and tour bus referenced in paragraph 76 of the COMPLAINT. For all responsive communications, identify the individuals involved in the communication, the date of the communication, the medium of the communication, and the substance of the communication.

ANSWER - 12/05/2022:

Defendant objects to this Interrogatory because it seeks the discovery of information that is not relevant to any party's claims or defenses, in particular because it seeks information about communications unrelated to this litigation. Subject to the foregoing Defendant states that promotional codes were used in the broadcasts and appearances referenced. Plaintiffs are further directed to Defendants' responses to Plaintiffs' Requests for Production of Documents. Discovery continues.

FIRST SUPPLEMENTAL ANSWER - 1/11/2023:

Without waiver of a previously stated objection, Defendant states that he will provide a supplemental response identifying documents produced when its review of potentially responsive documents is complete.

FOURTH SUPPLEMENTAL ANSWER - 9/27/2023:

Defendant objects to this Interrogatory as being overly broad, burdensome, and vague. Defendant objects to the interrogatory to "identify all communications" as better suited for a deposition as opposed to an interrogatory response. Without waiving any previously stated objections, Defendant's answer is based on information within his possession, custody, or control and in which he reasonably believes is responsive. To his knowledge, Defendant has produced all responsive documents. *See*, Fourth Supplemental Answer to Interrogatory No. 4.

Defendant reserves the right to amend or supplement these answers in accordance with the Federal Rules of Civil Procedure, the Local Rules of this Court, and any Court order, and other applicable rules, including based on his discovery of additional information and to rely upon such information in any hearing, trial or other proceeding in this litigation.

Without waiving any previously stated objections, Defendant objects to the interrogatory to “identify all communications” as better suited for a deposition as opposed to an interrogatory response. Defendant’s answer is based on information within his possession, custody, or control and in which he reasonably believes is responsive. To his knowledge, Defendant has produced all responsive documents. *See*, Fourth Supplemental Answer to Interrogatory No. 4.

Defendant reserves the right to amend or supplement these answers in accordance with the Federal Rules of Civil Procedure, the Local Rules of this Court, and any Court order, and other applicable rules, including based on his discovery of additional information and to rely upon such information in any hearing, trial or other proceeding in this litigation.

DATED: September 27, 2023

PARKER DANIELS KIBORT LLC

By /s/ Abraham S. Kaplan
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VERIFICATION

I declare under penalty of perjury that everything I have stated in this document is true and correct.

Dated: _____

My Pillow, Inc.

By: _____

Its: _____

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 27, 2023, a true and accurate copy of the foregoing was served via email to the following attorneys of record for Plaintiffs:

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DATED: September 27, 2023

By: Abraham S. Kaplan